

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Case No.: 1:22-cv-1032 (PKC) (JRC)

Plaintiff,

NOTICE OF MOTION

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, IME COMPANIONS LLC,
CLIENT EXAM SERVICES LLC, and IME
MANAGEMENT & CONSULTING LLC,

Defendants.

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PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, Plaintiff
IME WatchDog, Inc. will move this Court at the Courthouse located at 225 Cadman Plaza East,
Brooklyn, New York 11021, at a date and time to be determined by the Court, for an Order
permitting Plaintiff to file exhibits under seal and redact selected portions of other documents
submitted to the Court in connection with Plaintiff's supplemental brief concerning its
compensatory damages and attorneys' fees for Defendants Safa Gelardi, Vito Gelardi, IME
Companions LLC, Client Exam Services LLC, and IME Management & Consulting LLC.

Dated: Lake Success, New York
July 1, 2025

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

By: /s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York
July 1, 2025

SAGE LEGAL LLC

By: /s/ Emanuel Kataev, Esq.

Attorneys for Plaintiff